

REMARKS/ARGUMENTS

The rejections presented in the Office Action dated April 21, 2005 (hereinafter Office Action) have been considered. The specification has been amended to correct a reference number error. Claims 1, 16, 28, 32, and 33 have been amended, and Claims 34-36 have been added. No new matter has been added. Claims 1-36 remain pending in the application.

Claims 3-6, 8, 9, 11-14, 17-20, and 23-27 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. The conditional allowability of Claims 3-6, 8, 9, 11-14, 17-20, and 23-27 is acknowledged, and the Applicant thanks the Examiner for favorable consideration of these claims. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

Claims 1-2, 7, 10, 15-16, 21, and 32-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,463,534 to Geiger et al. (hereinafter *Geiger*) in view of U.S. Publication No. 2002/0004390 to Cutaia et al (hereinafter *Cutaia*). Applicants respectfully traverse the rejection.

According to MPEP §2142, to establish a prima facie case of obviousness under 35 U.S.C. §103:

- 1) there must be some suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings;
- 2) there must be a reasonable expectation of success; and
- 3) the prior art reference (or references when combined) must teach or suggest all the claim limitations.

The Applicant respectfully submits that the combination of *Geiger* in view of *Cutaia* does not teach or suggest all of the limitations of Claims 1-2, 7, 10, 15-16, 21, and 32-33, as originally filed and particularly as amended. Applicant's invention as recited, for example, in amended independent claims 1, 16, 28, 32, and 33, is directed to receiving a security certificate utilized by a wireless terminal in establishing a connection. The

connection is directed to either the targeted service or an enrollment manager depending on the security certificate utilized in establishing the connection. If the connection is directed to the enrollment manager, user registration is effected using a user identity and a private key. The combination of *Geiger* with *Cutaia* does not teach or suggest each and every one of these limitations.

Generally, *Geiger* describes a system for performing secure wireless transactions. *Geiger* appears to show receiving a certificate from a wireless terminal with security information indicative of user access rights and determining whether the received certificate corresponds to an authentication certificate of a targeted service. However, *Geiger* does not teach or suggest directing the network connection to an enrollment module to register for the authentication certificate if the received certificate does not correspond to the authentication certificate. For example, in col. 13, lines 54, *Geiger* states that “the client delivers a certificate to the AA that is certified within the wireless service provider domain 500, ... The AA server verifies this certificate in step 545 ... and the AA is ready to deliver the content item (attribute) to the client.” As to how users are authorized to enter particular domains, *Geiger* only states that the manufacturer can enroll users, distribute keys through the service provider domains, assign to device identifiers, and distribute via WIM card (col. 14, lines 20-37). *Geiger* is silent as to what happens if authentication fails, or how users can enroll for certificates upon authentication failure.

Cutaia is directed to a telecommunications management service. In paragraph [0040] relied upon in the Office Action, *Cutaia* describes a customer contact management system that directs a user to a registration step if the user’s computer lacks a corresponding registration “cookie,” or if it is detected that the user has not previously registered. However, *Cutaia* does not teach or suggest providing authentication certificates at the registration step. Instead, what is provided in *Cutaia*’s registration step is a user account creation form. Therefore *Cutaia* does not teach an enrollment manager that can provide authentication certificate which identifies access rights for a targeted service.

Further, the combination of *Gieger* and *Cutaia* fails to teach or suggest that the user is directed to register for the authentication certificate using a user identity and private key.

Geiger is silent on the particulars of producing authentication certificates, merely stating that “[d]omain members may be issued small attribute certificates, tied to their private domain key, that indicate purchased services or special rights being granted.” (col. 11, lines 1-3). This description falls short of describing a system for registering for authentication certificates using a user identity and private key. *Cutaia* is silent on any aspect of authentication certificates, therefore the combination of *Gieger* and *Cutaia* fails to teach or suggest this claim limitation.

In addition, there is no motivation to combine *Gieger* with *Cutaia*. Neither reference addresses at least one problem addressed by the Applicant’s invention, namely the inconvenience faced by a user in having to initiate a new and different connection (e.g., a WAP gateway connection) if authentication fails for a particular secure service. *Geiger* simply describes a situation where the behavior is undefined if the user is without the correct authentication certificate. *Geiger* fails to teach or otherwise disclose that a user may have to initiate a new connection in order to obtain the correct certificate. *Cutaia* describes a process for registration with a customer management system, and no new connection to a different service is required if the user in *Cutaia* is not currently registered. In *Cutaia* the same connection can be used to access the registration form (either by telephone or by a web browser) if the user was not currently registered. Neither reference recognizes that a wireless terminal user will have to contact an enrollment gateway using a new and different connection if the attempt to reach a target service is unauthorized. Because *Gieger* and *Cutaia* do not teach every claim limitation, and because motivation to combine *Gieger* with *Cutaia* is lacking, the Applicant respectfully submits that a *prima facie* case of obviousness has not been established. Therefore independent claims 1, 16, 28, 32, and 33 are in condition for allowance.

Dependent Claims 2, 7, 10, 15, and 21, which depend from respective independent Claims 1 and 16 were also rejected under 35 U.S.C. §103(a) as being unpatentable over *Geiger* in view of *Cutaia*. While Applicant does not acquiesce to the particular rejections to these dependent claims, it is believed that these rejections are now moot in view of the amendments and remarks made in connection with independent claims 1 and 16. These dependent claims include all of the limitations of the base claim and any intervening claims,

and recite additional features which further distinguish these claims from the cited references. Therefore, dependent claims 2, 7, 10, 15, and 21 are also patentable over the combination of *Geiger* and *Cutaia*.

Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over *Geiger* in view of *Cutaia* and further in view of U.S. Patent No. 6,367,013 to Bisbee et al. (hereinafter *Bisbee*). Applicant respectfully traverses the rejection.

As argued hereinabove, the combination of *Geiger* and *Cutaia* at least fail to teach or suggest directing a network connection to an enrollment manager to register for an authentication certificate using a user identity and private key if authentication fails. *Bisbee* fails to remedy the deficiencies of *Geiger* and *Cutaia*. *Bisbee* is directed to a system for dealing with the validity periods associated with authentication certificates. *Bisbee* describes re-validating the certificate at a Trusted Custodial Unit (TCU) in order to extend these validity periods (e.g., col. 4, lines 42-48). However, *Bisbee* is silent as to enabling enrollment for authentication certificates in situations where authentication fails. Therefore, the combination of *Geiger*, *Cutaia*, and *Bisbee* fail to teach or suggest directing a connection to an enrollment manager to effect user registration if authentication fails. Thus Applicant respectfully submits that a *prima facie* case of obviousness has not been established, and Claim 22 is in condition for allowance.

Claims 28-31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,463,534 to Rajan et al. (hereinafter *Rajan*) in view of *Geiger* and further in view of *Cutaia*. Applicant respectfully traverses the rejection.

Applicant first notes that the patent number 6,463,534 shown in the Office Action for *Rajan* is actually the patent number of *Geiger*. Further, *Geiger* is listed twice in the Notice of References cited, but *Rajan* is not listed at all. Without further information, Applicant cannot conclusively determine the identity of the *Rajan* reference relied upon in the Office Action. Therefore, Applicant respectfully requests that the correct patent number for *Rajan* be provided in a subsequent correspondence.

Regardless, Applicant traverses the rejection, and contends that the combination of *Geiger* and *Cutaia* fail to teach at least the claim limitations of independent Claim 28 as set

forth in the Office Action. According to the Office Action, *Rajan* does not teach a network switch coupled to receive an authentication certificate utilized by a wireless terminal in establishing a connection to the server computing server or the enrollment server depending on the authentication certificate utilized by the wireless terminal in establishing the connection. Nonetheless, according to the Office Action, *Geiger* teaches storing wireless certificates on mobile devices, and *Cutaia* teaches the concept of switching either to inquiry services or registration services based on whether the inquiry information from the customer contained registration information. Therefore, according to the Office Action it would be obvious to combine *Geiger* and *Cutaia* with *Rajan*.

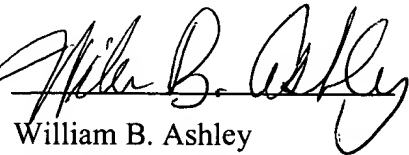
As argued hereinabove, the combination of *Geiger* and *Cutaia* at least fail to teach or suggest directing a network connection to an enrollment manager to register for an authentication certificate using a user identity and private key if authentication fails. According the Office Action, *Rajan* does not teach a network switch that directs a network connection to an enrollment server depending on the authentication certificate utilized by the wireless terminal in establishing the connection. Therefore, the combination of *Rajan*, *Geiger* and *Cutaia* also fail to teach this claim limitation, and Applicant submits that Claims 28-31 are also in condition for allowance.

If the Examiner believes it necessary or helpful, the undersigned agent of record invites the Examiner to contact him at 952-854-2700 to discuss any issues related to this case.

Respectfully submitted,

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